

## JONES DAY

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December 28, 2017

BY ECF

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Fresno County Employees' Retirement Association, et al. v. comScore, Inc., et al.*  
*Case No. 1:16-cv-01820 (JGK)*

Dear Judge Koeltl:

We represent Defendants comScore, Inc. (“comScore”), William J. Henderson, Russell Fradin, Gian M. Fulgoni, William Katz, Ronald J. Korn, and Joan Lewis in the above-captioned action. We write on behalf of all parties in this action.

On September 13, 2017, Plaintiffs and Defendants comScore, Magid Abraham, Serge Matta, Melvin F. Wesley III, William J. Henderson, Russell Fradin, Gian M. Fulgoni, William Katz, Ronald J. Korn, and Joan Lewis (the “comScore Defendants”) informed this Court that they had reached a settlement in principle of all of the claims in this action and requested that this Court stay the action and all corresponding deadlines to and including November 30, 2017 to allow the parties to prepare a stipulation of settlement and file a motion for preliminary approval of the settlement. On September 15, 2017, the Court granted the parties’ request for a stay of proceedings. On November 29, 2017, Plaintiffs and the comScore Defendants requested an extension of the stay of the Action and all corresponding deadlines to and including December 30, 2017 to allow the parties to finalize the stipulation of settlement and file a motion for preliminary approval of the settlement. On November 30, 2017, the Court granted the parties’ request for an extension.

Since that time, the parties have worked diligently to finalize the stipulation of settlement, and on December 28, 2017, Plaintiffs and the comScore Defendants executed the stipulation of settlement. However, on account of the holidays, more time is required to file the preliminary approval motion. Accordingly, the parties respectfully request that the Court extend the stay of this action, including the comScore Defendants’ obligation to answer the Second Consolidated Class Action Complaint, for another 15 days, to and including January 12, 2018, to allow the parties to file a motion for preliminary approval. A Stipulation and Proposed Order is attached hereto.

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Dated: New York, New York  
December 28, 2017

Respectfully Submitted,

/s/ Nina Yadava

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